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SURGICAL INSTRUMENT SERVICE COMPANY, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SURGICAL INSTRUMENT SERVICE
COMPANY, INC.,

Plaintiff/Counter-Defendant,

v.

INTUITIVE SURGICAL, INC.,

Defendant/Counterclaimant.

Case No. 3:21-cv-03496-VC

Honorable Vince Chhabria

**JOINT MOTION FOR ENTRY OF
STIPULATED PROTECTIVE ORDER**

Complaint Filed: May 10, 2021

Pursuant to Fed. R. Civ. P. 26(c)(7) and the Civil Chambers Rules of Hon. Vince Chhabria, and following the Model Protective Order from this District, the Parties jointly request entry of the Proposed Stipulated Protective Order lodged herewith as Exhibit A.

The Parties have met and conferred regarding the Proposed Protective Order, which is based on this District's Model Protective Order. The Parties have made certain revisions that deviate from this District's Model Protective Order and agree that the revisions, as indicated by

the redlined version lodged herewith as Exhibit B, are necessary given the complex nature of the issues of this case, the volume and nature of the discovery anticipated to be exchanged, and the sensitive nature of information to be exchanged. Additionally, the Parties submit that the deviations are necessary to bring the Proposed Protective Order into alignment with the protective order entered in a related case before this Court, namely, *In Re: Da Vinci Surgical Robot Antitrust Litigation*, Case No. 3:21-cv-03825-VC.

Accordingly, the Parties, by and through their undersigned counsel, jointly request and hereby move for entry of a Protective Order in this Case in the form set forth in the proposed Protective Order submitted concurrently herewith, or as otherwise deemed appropriated by the Court.

Dated: March 29, 2022

Respectfully submitted,

HALEY GUILIANO LLP

By: /s/ Gregory J. Lundell

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***SIGNATURE ATTESTATION**

I, Gregory Lundell, am the ECF User whose ID and password are being used to file the foregoing **JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER**. In compliance with Civil Local Rule 5-1(h)(3), I hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories.

Dated: March 29, 2022

/s/ Gregory J. Lundell

Gregory J. Lundell

CERTIFICATE OF SERVICE

I hereby certify that on March 29, 2022, I caused a copy of the foregoing **JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER**, to be electronically filed and served electronically via the Court's CM/ECF system, which will send automatically serve notice to all registered counsel of record.

Dated: March 29, 2022

/s/ Mi Ung
Mi Ung